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James D. Schultz
Vice President, Environment

Via Certified Mail -
Return Receipt Requested

October 21, 2002

Matt Straus
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: AISI's Recent Meeting to Discuss Spent Pickle Liquor Recycling

Dear Matt:

Thank you for taking the time on Wednesday, October 16, 2002 to meet with American Iron and Steel Institute (AISI) member company representatives and me. As you know, AISI member companies continue to be concerned with regulatory obstacles under the Resource Conservation and Recovery Act (RCRA) that currently impede and discourage the regulated community's efforts to recycle spent pickle liquor in an environmentally protective manner. Although we were disappointed that, at the present time, the U.S. Environmental Protection Agency (EPA) appears to be unable to work with AISI to provide specific regulatory relief for the recycling of spent pickle liquor, we are encouraged that EPA is considering more generic regulatory relief for recycling practices in a future rulemaking.

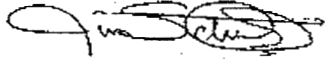
Specifically, you indicated that EPA is currently working on crafting additional recycling exclusions under the RCRA definition of solid waste. AISI hereby requests that an appropriate recycling exclusion be drafted to provide our member companies with meaningful regulatory relief for their spent pickle liquor recycling efforts.

You also indicated that materials recycled by a facility within the same industry code (i.e., North American Industry Classification System) as the generating facility might be excluded from the definition of solid waste. Although AISI would support an intra-industry based exclusion, AISI believes that it would not help our industry's spent pickle liquor recycling efforts because many of the facilities that actually recycle the spent pickle liquor do not come within the generator's industry code. Accordingly, AISI specifically requests that EPA ensure that the contemplated RCRA recycling exclusion have extended applicability to recycling facilities even if such facilities fall within different industry codes. Per your recommendation, AISI will submit more detailed comments to Charlotte Mooney and Ingrid Rosencrantz.

Thank you again for the opportunity to meet with you. AISI and its member companies look forward to working with EPA in the future on these important recycling issues. If you have any

questions or need any additional information, please do not hesitate to contact me at 202.452.7180 or jschultz@steel.org.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Jim Schultz", with a stylized flourish at the end.

Jim Schultz
Vice President, Environment and Energy